

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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In re:

WASHINGTON PRIME GROUP INC., *et al.*,<sup>1</sup>

Debtors.

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)  
) Chapter 11  
)  
) Case No. 21-31948 (MI)  
)  
) (Jointly Administered)  
) **RE: Docket No. 174**

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**CERTIFICATE OF COUNSEL**

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Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas* (the “Complex Case Procedures”), the undersigned counsel for the above-captioned debtors (collectively, the “Debtors”) certifies as follows:

1. On June 25, 2021, the Debtors filed the *Debtors’ Motion for Entry of an Order (I) Authorizing the Retention and Compensation of Certain Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief* [Docket No. 174] (the “OCP Motion”).

2. The deadline to object to the relief requested in the OCP Motion was July 16, 2021 (the “Objection Deadline”). No objections or responses to OCP Motion were filed on the docket on or before the Objection Deadline. Counsel for the Debtors received comments on the OCP Motion from the United States Trustee, which were incorporated by the Debtors and are reflected in the attached revised proposed order.

3. Counsel for the Debtors did not receive any other informal or formal responses or objections to the OCP Motion. The undersigned certifies that the attached proposed order resolves

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.primeclerk/washingtonprime>. The Debtors’ service address in these chapter 11 cases is 180 East Broad Street, Columbus, Ohio 43215.

all known responses to the relief requested in the OCP Motion. A redline reflecting changes to the proposed order is attached.

4. The Debtors request that the Court enter the attached proposed order its earliest convenience.

Houston, Texas  
July 19, 2021

/s/ Matthew D. Cavanaugh

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*Proposed Co-Counsel to the Debtors  
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**Certificate of Service**

I certify that on July 19, 2021, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Matthew D. Cavanaugh  
Matthew D. Cavanaugh